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***Attorneys for Plaintiffs*** UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista Music

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL  
 RECORDS, LLC, CONCORD BICYCLE  
 ASSETS, LLC, CMGI RECORDED MUSIC  
 ASSETS LLC, SONY MUSIC  
 ENTERTAINMENT, and ARISTA MUSIC

Plaintiff(s),

vs.

INTERNET ARCHIVE, BREWSTER  
 KAHLE, KAHLE/AUSTIN FOUNDATION,  
 GEORGE BLOOD, and GEORGE BLOOD,  
 L.P.

Defendant(s).

) Case No.: 3:23-cv-06522-MMC

) **Stipulation and Proposed Order to Extend**  
 ) **Stay of Proceedings**

Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded Music Assets LLC, Sony Music Entertainment, and Arista Music ("collectively, "Plaintiffs") and Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, and George Blood LP (collectively, "Defendants") (Plaintiffs and Defendants shall collectively be referred to as the "Parties"), hereby stipulate as follows:

WHEREAS, on April 4, 2025, the Court granted the Parties' first stipulation to stay the case for thirty days, ECF No. 168, and that stay is set to expire on May 5, 2025;

WHEREAS, the Parties have continued to engage in and make meaningful progress in settlement discussions and believe a thirty (30) day extension of the current stay will facilitate resolution of this matter;

WHEREAS, the Parties remain optimistic that these discussions may result in a resolution that would allow for the case to be dismissed;

WHEREAS, in the event that settlement discussions do not result in a resolution, the Parties agree to confer and submit a proposed schedule to the Court to reset case deadlines;

NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to order as follows:

1. All proceedings and deadlines in this case shall be stayed through and including June 4, 2025 to allow the Parties to continue their settlement discussions.
2. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
3. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

**IT IS SO STIPULATED.**

1 Dated: April 30, 2025

2 /s/ Matthew J. Oppenheim

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27 ***Attorneys for Plaintiffs UMG Recordings, Inc.;***  
 28 ***Capital Records, LLC; Concord Bicycle Assets,***  
***LLC; CMGI Recorded Music Assets LLC; Sony***  
***Music Entertainment; and Arista Music***

/s/ Andrew M. Gass

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***Attorneys for Defendants Internet Archive,***  
***Brewster Kahle, Kahle/Austin Foundation,***  
***George Blood, and George Blood L.P.***

**SIGNATURE ATTESTATION**

Pursuant to Civ. L.R. 5.1, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a “conformed” signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered for inspection upon request.

Dated: April 30, 2025

OPPENHEIM + ZEBRAK, LLP

/s/Matthew J. Oppenheim

Matthew J. Oppenheim

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

UMG RECORDINGS, INC., CAPITOL  
RECORDS, LLC, CONCORD BICYCLE  
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Plaintiff(s),

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GEORGE BLOOD, and GEORGE BLOOD,  
L.P.

Defendant(s).

Case No.: 3:23-cv-06522-MMC

**[Proposed] Order to Extend Stay of  
Proceedings**

The Court, having considered the Parties' Stipulation to Extend Stay of Proceedings, and good cause having been shown, hereby orders as follows:

1. All proceedings and deadlines in this case shall be stayed through and including June 4, 2025 to allow the Parties to continue their settlement discussions.
2. If the settlement discussions result in a resolution, the Parties will promptly file an appropriate dismissal with the Court.
3. If the settlement discussions are not successful, the Parties shall meet and confer to propose a new schedule for the case and submit a joint proposed scheduling order to the Court within ten (10) days following the expiration of the stay.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
MAXINE M. CHESNEY  
United States District Judge